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Attorneys for Plaintiff X Corp.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

X CORP.,

Plaintiff,

v.

ROBERT A. BONTA, Attorney
General of California, in his
official capacity,

Defendant.

No. 2:23-cv-01939-WBS-AC

**NOTICE OF REQUEST TO REDACT OR
FILE UNDER SEAL THE TRUST AND
SAFETY TEAM AFFIANT'S IDENTITY**

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that, pursuant to Local Rules 140 and 141,
3 on October 6, 2023 - concurrent with filing this notice - Plaintiff
4 X Corp. has made a narrow Request to Redact or File Under Seal the
5 Trust and Safety Team Affiant's Identity in the Trust and Safety
6 Team Affidavit in Support of X Corp.'s Motion for Preliminary
7 Injunction, and has submitted an accompanying Affidavit of Ben
8 Elron in support of such request. The information sought to be
9 redacted is the Trust and Safety Team Affiant's name, employment
10 title, and the location where the affidavit was executed.

11 If the identity of the Trust and Safety Team Affiant is made
12 public, there is a serious risk that the affiant will face threats,
13 harassment, and an invasion of privacy. The non-redacted Trust
14 and Safety Team Affidavit, proposed redacted Trust and Safety Team
15 Affidavit, Request to Redact or File Under Seal, Affidavit of Ben
16 Elron in Support of the Request to Redact or File Under Seal, and
17 Proposed Order Granting X Corp.'s Request to Redact or File Under
18 Seal, have been emailed to the Honorable Judge Shubb's proposed
19 orders email box and served on all other parties in accordance with
20 Local Rule 141(b).

21
22
23 DATED: October 6, 2023

24 Respectfully submitted,

25 /s/ Joel Kurtzberg

26 CAHILL GORDON & REINDEL LLP

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